

ORIGINAL

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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

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SEAN F. McAVOY, CLERK
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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,) 2:16-CR-00207-RMP

Plaintiff,) INFORMATION

vs.) Vio: 18 U.S.C. §§ 922(m),

924(a)(3)(B), 2

TERRY RUSSELL HUNT,) Aiding False Entries By
MARY ALICE HUNT,) Firearms Dealer
RUSSELL MELVIN HUNT, and) (Counts: 1-3)
DEREK JON HUNT)

Defendants.

The Acting United States Attorney Charges that:

GENERAL ALLEGATIONS

At all times material to this Information:

1. The Bureau of Alcohol, Tobacco, Firearms, and Explosives (“ATF”) was an agency of the executive branch of the United States government.

2. One of ATF's responsibilities under federal law was to administer the federal licensing scheme for federally licensed firearms dealers (FFL) and inspect the records of operations of FFLs. Federal law required FFLs to follow the laws and regulations governing the sale and transfer of guns.

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1 3. An individual not named herein held Federal Firearms License x-xx-xxx-
2 xx-xx-xxx52, which was issued by the ATF Licensing Section, under the trade name
3 of xx Co., located in Olympia, Washington. As the holder of a Federal Firearms
4 License, that individual was required to maintain a record, in the form of a completed
5 Form 4473, of the identity and address of the actual buyer of the firearms he sold,
6 including the buyer's name, home address and date of birth.

COUNT 1

4. Paragraphs 1 through 3 of the General Allegations section of this Information are re-alleged and fully incorporated herein by reference.

5. On or about March 25, 2013, in the Western District of Washington, Defendants TERRY RUSSELL HUNT, MARY ALICE HUNT, RUSSELL MELVIN HUNT, and DEREK JON HUNT, did knowingly aid, abet, induce and procure a licensed firearms dealer, to make false entries in, and otherwise fail to properly maintain, records which the licensed firearms dealer was required to keep pursuant to section 923 of Chapter 44, Title 18, United States Code, and regulations enacted under that statutory authority, that is, those records required to be completed and retained by Title 18, United States Code, Section 923(g)(1), in connection with the sale of the following firearms: Smith & Wesson, Model 36, .38 SP, Revolver, bearing serial number ACH3992; Glock, Model 26, 9mm, bearing serial number UPY937; Glock Model 23, .40 caliber, bearing serial number UKR876, and Kimber, Model Compact, .45 caliber, bearing serial number KCO5513, in that Defendants TERRY RUSSELL HUNT, MARY ALICE HUNT, RUSSELL MELVIN HUNT, and DEREK JON HUNT, caused to be made a Firearms Transaction Record (ATF Form 4473)

corresponding to each sale of the firearms listed below that falsely identified an individual identified herein as "D.H." as the actual buyer of those firearms even though Defendants TERRY RUSSELL HUNT, MARY ALICE HUNT, RUSSELL MELVIN HUNT, and DEREK JON HUNT, and the licensed firearms dealer knew that Defendant TERRY RUSSELL HUNT was the actual buyer of the firearms.

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1 All in violation of 18 U.S.C. §§ 922(m), 924(a)(3)(B), and 2.
2

COUNT 2

3 6. Paragraphs 1 through 3 of the General Allegations section of this
4 Information are re-alleged and fully incorporated herein by reference.
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6 7. On or about April 26, 2013, in the Western District of Washington,
7 Defendants TERRY RUSSELL HUNT, MARY ALICE HUNT, RUSSELL MELVIN
8 HUNT, and DEREK JON HUNT, did willfully and knowingly aid, abet, induce and
9 procure a licensed firearms dealer, to make false entries in, and otherwise fail to
10 properly maintain, records which the licensed firearms dealer was required to keep
11 pursuant to section 923 of Chapter 44, Title 18, United States Code, and regulations
12 enacted under that statutory authority, that is, those records required to be completed
13 and retained by Title 18, United States Code, Section 923(g)(1), in connection with
14 the sale of the following firearms: Rock River Arms, AR-15, 5.56mm, Rifle, bearing
15 serial number LH104728; Rock River Arms, AR-15, 5.56mm, Rifle, bearing serial
16 number LH104730; and Savage, Model 42, .22LR/.410 gauge, Rifle, bearing serial
17 number H856503, in that Defendants TERRY RUSSELL HUNT, MARY ALICE
18 HUNT, RUSSELL MELVIN HUNT, and DEREK JON HUNT, caused to be made a *AT*
19 Firearms Transaction Record (ATF Form 4473) corresponding to each sale of the *RLD*
20 firearms listed below that falsely identified an individual *identified* *MAP* *BS* *9-6-17*
21 as the actual buyer of those firearms even though Defendants TERRY RUSSELL *Each*
22 HUNT, MARY ALICE HUNT, RUSSELL MELVIN HUNT, and DEREK JON *OTJ*
23 HUNT, and the licensed firearms dealer knew that Defendant TERRY RUSSELL *TJ*
24 HUNT was the actual buyer of the firearms.

25 All in violation of 18 U.S.C. §§ 922(m), 924(a)(3)(B), and 2.

COUNT 3

26 8. Paragraphs 1 through 3 of the General Allegations section of this
27 Information are re-alleged and fully incorporated herein by reference.
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1 9. On or about August 9, 2013, in the Western District of Washington,
2 Defendants TERRY RUSSELL HUNT, MARY ALICE HUNT, RUSSELL MELVIN
3 HUNT, and DEREK JON HUNT, did willfully and knowingly aid, abet, induce and
4 procure a licensed firearms dealer, to make false entries in, and otherwise fail to
5 properly maintain, records which the licensed firearms dealer was required to keep
6 pursuant to section 923 of Chapter 44, Title 18, United States Code, and regulations
7 enacted under that statutory authority, that is, those records required to be completed
8 and retained by Title 18, United States Code, Section 923(g)(1), in connection with
9 the sale of the following firearms: Mossberg, Model 464, .30-.30 Rifle, bearing serial
10 number LA040519; Kimber, Model CDP, .45 ACP caliber, bearing serial number
11 K101568; Ruger, Modle LCP, .380 ACP caliber, Pistol, bearing serial number
12 371145406; Smith & Wesson, Bodyguard, .380 caliber, Pistol, bearing serial number
13 KAR3743; and Smith & Wesson, Bodyguard, .380 caliber, Pistol, bearing serial
14 number KAR3698; in that Defendants TERRY RUSSELL HUNT, MARY ALICE
15 HUNT, RUSSELL MELVIN HUNT, and DEREK JON HUNT, caused to be made a
16 Firearms Transaction Record (ATF Form 4473) corresponding to each sale of the
17 firearms listed below that falsely identified an individual *identified* *as* *D.H.* *3L13* *9-6-17*
18 as the actual buyer of those firearms even though Defendants TERRY RUSSELL
19 HUNT, MARY ALICE HUNT, RUSSELL MELVIN HUNT, and DEREK JON
20 // *Earl*
21 // *D.J.*
22 // *T.H.*
23 //
24 //
25 //
26 //
27 //
28 //

1 HUNT, and the licensed firearms dealer knew that Defendant TERRY RUSSELL
2 HUNT was the actual buyers of the firearms.

3 All in violation of 18 U.S.C. §§ 922(m), 924(a)(3)(B), and 2.

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5 DATED this 6th day of September, 2017.

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7 JOSEPH H. HARRINGTON

8 Acting United States Attorney

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10 Earl A. Hicks

11 Earl A. Hicks

12 Assistant United States Attorney

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14 George J. C. Jacobs, III

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